



August 21, 2019

Ms. Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, SW  
Washington, DC 20554

**Re: Concord Telephone Exchange, Inc. - Notice of Network Change**

Dear Ms. Dortch:

Pursuant to Section 51.325 – 51.335 of the Commission's rules, Concord Telephone Exchange, Inc. ("Concord") hereby submits the attached: Certification of Public Notice of Network Change under rule 51.329(a); Public Notice of Copper Retirement under rule 51.333; and Certification of Public Notice of Copper Retirement under rule 51.333. Specifically, Concord is providing notification of the replacement of copper distribution and loop facilities with fiber-to-the-home facilities in a certain digital service area (DSA) located in Knoxville, TN. Upon completion, Concord will provide services through its fiber optic network.

All of the customers served by copper at these locations purchase "plain old telephone service" (POTS). Following transition to fiber, Concord will continue to offer these customers the same POTS service over fiber at the same or better price as they received on copper facilities. There will be no change in the underlying features and functionalities in their service: this is not a transition to IP-based service, and Concord will offer these customers the same regulated service they have today.

Please contact me should you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to be "Pam Trickel", is written over a horizontal line.

Pam Trickel  
Sr. Administrator -Regulatory Compliance

Attachments

**CERTIFICATION OF PUBLIC NOTICE OF NETWORK CHANGE  
UNDER RULE 51.329(a)**

On August 9, 2019 the following Public Notice of Network Change has been made by Concord Telephone Exchange, Inc. pursuant to 47 C.F.R. §§ 51.325 – 51.335.

The Public Notice may also be viewed on TDS' website at:  
<https://tdstelecom.com/carrierservices/public-notices/2019.html>

Title of Network Notification:  
TDS Public Notice 2019-42 Knoxville, TN (Hobbs) – Copper Retirement

Pam Trickel  
Sr. Administrator Regulatory Compliance  
TDS Telecommunications LLC  
525 Junction Rd  
Madison, WI 53717  
608-664-7872

Date: August 9, 2019

**PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.333**  
**Copper Retirement ID - TDS Public Notice 2019-42 Knoxville, TN (Hobbs)**

August 9, 2019

**Carrier:** Concord Telephone Exchange, Inc, 11505 Kingston Pike, Knoxville, TN 37934

**Contact:** For additional information on these planned network changes, please contact:

Jennifer Heise  
Regulatory Compliance Manager  
TDS Telecommunications Corporation  
525 Junction Rd  
Madison, WI 53717  
608-664-4148

**Implementation Date:** On or after December 2, 2019

**Planned Network Change(s) Will Occur at the Following DSAs:**

Locations

Retirement of  
copper network facilities  
in the area listed in Exhibit A

DSA 17804 – 110 Saddle Ridge Dr, Knoxville,  
TN 37934

CLLI - CNCRTNA4

**Description of the Planned Network Change(s):**

Concord Telephone Exchange, Inc. intends to retire a number of copper facilities in the DSA locations listed on the attached Exhibits to provide services over a fiber network infrastructure. Concord Telephone Exchange, Inc. has deployed its fiber-to-the-home network in the areas identified in Exhibits A.

**Description of Reasonably Foreseeable Impact(s) of the Planned Change(s):**

After the retirement of the copper facilities, Concord Telephone Exchange, Inc. will: (1) no longer offer services over copper facilities; and (2) cease maintaining the copper facilities. These retirements will have no impact on the services provided to the retail customers served by the copper facilities that will be retired. Further, there will be no changes to rates, terms and conditions.

**Exhibit A**  
**Copper Retirement ID - TDS Public Notice 2019-42 Knoxville, TN (Hobbs)**

The copper facilities associated with the following addresses served by  
Concord's DSA 17804 located at 110 Saddle Ridge Dr, Knoxville, TN

CLLI - CNCRTNA4

<b>Community</b>	<b>Street</b>	<b>Building Number</b>
Knoxville	Kingston Pike	12814, 12823
Knoxville	Paladin Ln	12810
Knoxville	Saddle Ridge Dr	110

## **CERTIFICATION OF PUBLIC NOTICE OF COPPER RETIREMENT UNDER RULE 51.333**

I, Linda Robinson, do hereby certify that on August 9, 2019 (a minimum of five business days prior to filing with the Commission), I caused Concord Telephone Exchange, Inc.'s Public Notice of Copper Retirement Under Rule 51.333 to be served upon each telephone exchange service provider that directly interconnects with Concord Telephone Exchange, Inc.'s network in the applicable area(s). Attached in Exhibit B are the names and addresses of those providers who were served.

The Public Notice may also be viewed on TDS' website at:  
<https://tdstelecom.com/carrierservices/public-notice/2019.html>

Title of Network Notification:  
TDS Public Notice 2019-42 Knoxville, TN (Hobbs) – Copper Retirement

Linda N. Robinson  
Manager - Regulatory Compliance & Carrier Relations  
TDS Telecommunications Corporation  
525 Junction Rd  
Madison, WI 53717  
865-671-4758

Date: August 9, 2019

**Exhibit B**  
**Copper Retirement ID - TDS Public Notice 2019-42 Knoxville, TN (Hobbs)**

AT&T Services, Inc., 675 West Peachtree Street, Atlanta, GA 30308

AT&T Mobility, 1 AT&T Way, Room 4A105, Bedminster, NH 07921

Comcast Corporation, One Comcast Center, 55<sup>th</sup> Floor, Philadelphia, PA 19103

AT&T, 600 N 19th Street, Birmingham, AL 35203